



November 19, 2021

Steffany Powell Coker  
Secretary to the Commission  
Public Service Commission  
P.O. Box 7854  
Madison, WI 53707-7854

RE: Docket 5-FE-104 Quadrennial Planning Process IV Scoping Memorandum

Dear Steffany Powell Coker,

Slipstream appreciates the opportunity to provide comments on Docket 5-FE-104 regarding the Public Service Commission of Wisconsin's (PSCW) Quadrennial Planning Process IV Scoping Memorandum.

#### **About Slipstream**

Slipstream is a 501(c)(3) organization with the mission to accelerate climate solutions for all. Since 1980, we have delivered on our mission by conducting a wide range of energy efficiency, renewable energy, and efficient electrification research and planning; designing and implementing clean energy programs that account for human behavior and the many value propositions that motivate clean energy adoption; offering financing interventions to help overcome the first-cost barriers that prevent measure adoption; and providing education and training to ready the workforce for family supporting jobs in clean energy, elevate fluency in clean energy systems, and ensure high quality installations and consumer experiences. We provide these services as a team composed of 155 engineers, analysts, evaluators, program designers, program managers, building scientists, trainers, marketers, and policy, economics, and financing specialists.

Slipstream supports the direction of the Quadrennial Planning Process Phases and Proposed Topics the PSCW describes in the Scoping Memorandum. Of the Commission Alternatives identified on page 7 of the Scoping Memorandum, Slipstream suggests the PSCW move forward with Alternative Two: Approve the scope of the Quad IV planning process identified in Table 2, with modifications.

Slipstream suggests the following modifications and considerations for the Quadrennial Planning scope. Some of these suggestions are included or implied in the Proposed Quad IV Topics in Table 2 and are added here to reinforce their importance and/or suggest directionality for future investigation, analysis, and decision.

- Set carbon dioxide emission reduction goals for all energy efficiency and renewable energy programs overseen by the PSCW. Carbon dioxide emission reduction goals should be set as the primary performance indicator of these programs, alongside energy savings and demand goals, in order to stay within Wisconsin's carbon budget. The carbon dioxide emission reduction goals should align with the best available climate

science, i.e. the science and methods put forth by the United Nations Framework Convention on Climate Change (UNFCCC). Unless energy savings goals are set to achieve carbon dioxide emission reduction goals that use the best climate science and perform within the limits of Wisconsin's carbon budget, the carbon dioxide emission reduction goals must be more ambitious than the product of carbon intensity and the plan's energy savings goals. In other words, the intention of this suggestion is to ensure scientifically warranted emission reduction and not simply convert energy savings goals and achievements to a greenhouse gas value. Conducting an environmental scan of other states/jurisdictions that have adopted carbon dioxide emission reduction goals for energy programs may be helpful to better understand approaches used and lessons learned (e.g. California, Massachusetts).

- Update the approach for the next and future potential studies to ensure the effort ambitiously quantifies energy efficiency and renewable energy potential without regard to anticipated programmatic funding. Include or separately conduct a statewide electrification potential study to better understand, characterize, and quantify the electrification opportunity in the state (first conducting an environmental scan and outreach to understand approaches and lessons learned from other states/jurisdictions and utility territories in the United States that have quantified and characterized electrification potential).
- Establish methods to enable accurate claimable savings and support market influencing incentives for fuel switches from propane, fuel oil, and diesel (in addition to the already allowable switches between electric and natural gas). Determining, communicating, and implementing these methods for fuel switching expeditiously will position Wisconsin to meet environmental goals.
- Align programs and funding with the Energy Priority Law.<sup>1</sup>
- Review and update the health and other non-energy benefits in cost effectiveness tests to comprehensively capture and monetize the value of those benefits, and specifically increase the price of carbon to the federal Social Cost of Carbon (and its schedule for escalation).
- Establish goals, metrics, and reporting to achieve greater equity in participation, benefits delivery, and transparency regarding results. Seek collaboration and alignment with the Office of Sustainability and Clean Energy and other agencies regarding BIPOC, income differentiated, and other demographic inclusion.
- Offer low-income programs in Focus on Energy and harmonize and stack low-income programs across the state to optimize participant (and would-be participant) information, participation, and redress. Reflect these approaches in efforts to establish goals, metrics, and reporting to achieve greater equity as suggested in the previous bullet.
- Review and evaluate the place of vehicle electrification within energy efficiency and renewable programs under the PSCW oversight. Consider and determine whether electric vehicle and related infrastructure programs ought to be bolted onto Focus on Energy and other overseen programs, or recommend alternative approaches informed by stakeholder advisement.

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<sup>1</sup> <https://docs.legis.wisconsin.gov/statutes/statutes/1/12/4>



- Align incentives and other programming for natural gas and other fossil fuel end uses with Wisconsin's decarbonization goals and carbon budget based on the best climate science.

Slipstream appreciates the opportunity to comment on Docket 5-FE-104 regarding the PSCW's Quadrennial Planning Process IV Scoping Memorandum, and the PSCW's consideration of our aforementioned scoping suggestions. We look forward to further opportunities to comment on the Quadrennial Planning Phases and Topics and to provide supporting information and analysis as might be necessary to support the process.

Sincerely,

*Robin Lisowski*

Robin Lisowski  
Director of Service Solutions  
Slipstream

